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JOHN J. MEEHAN

April 18, 2016

Honorable Robert W. Sweet
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Schoolcraft v. The City of New York, et al*
Index No. 10-cv-6005

Dear Judge Sweet:

On behalf of all of plaintiff's counsel, I am writing now to request that the Court issue an Order, *nunc pro tunc*, extending plaintiff's time to submit a Reply brief on the pending fee application, from April 15, 2016 to April 29, 2016. Defense counsel, Alan Scheiner, Esq, consents to this request, but asks that the Court also adjourn the date for oral argument on the motion, which is currently set for May 4, 2016, until May 12, 2016, or any date thereafter that is convenient to the Court. Plaintiff consents to this request.

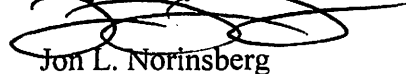
There are two reasons for this application. First, plaintiff's counsel mistakenly believed that our Reply brief was due on April 22, 2016, which would be 14 days after the City filed its opposition brief. However, as defense counsel correctly points out, the actual wording of the Court's Order states "14 days after the date of the *conference*," not 14 days after the date the City's brief is filed. (Docket No. 591). We apologize to the Court for this oversight, as we truly believed that we had 14 days, or until April 22, 2016, to respond to the City's brief.

In any event, due to the sheer volume of the City's submission, plaintiff's counsel needs additional time to respond to the many arguments raised by the City and its expert, Judith Bronsther. The brief itself is 73 pages long. The expert's report is 118 pages long without exhibits, and 295 pages with exhibits. Given the enormous volume of this submission, plaintiff's counsel requires additional time to respond to the City's opposition papers.

Based on the foregoing, plaintiff respectfully requests that the Court issue an Order, *nunc pro tunc*, extending plaintiff's time to submit a Reply brief on the fee application from April 15, 2016 to April 29, 2016, and if the Court grants this request, adjourning the date for oral argument on the fee application from May 4, 2016, until May 12, 2016, or any date thereafter that is convenient to the Court.

We thank the Court for its consideration of this request.

Respectfully submitted,



Jon L. Norinsberg

By ECF and e-mail
cc: all Counsel
(by e-mail)